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February 7, 2025

Via ECF

Hon. Colleen McMahon
Senior U.S. District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Polad Omarov*, 22 Cr 438 (CM)
Defense Motions in Limine

Dear Judge McMahon:

Through Counsel, Mr. Polad Omarov makes the following motions in *limine*, ahead of his trial, currently scheduled for March 10, 2025.

II. Motion to Adjourn the Trial

On February 4, 2025, weeks before the start of this trial, the President of the United States, referencing a plot similar if not identical to the scheme alleged in the charges against Mr. Omarov, announced that he had “left instructions” for Iran to be “obliterated” if he were assassinated by Iranian agents.

It is respectfully submitted that the only cure for this highly prejudicial publicity is to grant a 90 day adjournment of the trial. It should be noted that no one in Your Honor’s courtroom caused or could have prevented this incident. It is equally true that no party to this action would have sought an adjournment but for the President’s widely reported statement. See copy of the February 4, 2025 New York Times story, digital edition, attached as Exhibit A.

We make this application only to ensure that Mr. Omarov receives a fair trial from a jury untainted by the prejudicial statements of the highest elected official in the United States.

Dated: February 7, 2025
New York, New York

s/ Andrew Patel

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s/ Elena Fast

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cc: All attorneys of record (via ECF)